

Voluntary Survey

Alternative Control Plan (ACP) Regulation

The Stationary Source Division (SSD) of the Air Resources Board (ARB) is requesting your assistance in completing this voluntary survey to help improve the ACP regulation (Title 17, California Code of Regulations, Sections 94540-94555). The ACP regulation is available on the ARB website at: <http://www.arb.ca.gov/consprod/regs/regs.htm>. The ACP regulation is a voluntary, market-based emissions averaging program or "bubble" which ensures that the total emissions do not exceed the emission levels that would occur if the product met the Volatile Organic Compound (VOC) limits in the consumer products regulation.

Please complete this side of the questionnaire if you are interested in participating in workshops or teleconferences to amend the ACP regulation and develop guidelines or wish to be added to a mailing list for future updates. Please complete side 2 of the questionnaire if you are familiar with the ACP regulation and wish to provide input or comments. The information provided will be summarized and will be used to develop amendments to the ACP regulation.

We appreciate your time spent in providing the information on the survey form. When you have completed this survey, please mail the form before **October 6, 2000** to:

Steven Giorgi, Manager
Implementation Section
California Air Resources Board (SSD)
P.O. Box 2815
Sacramento, CA 95812

or you may fax the information to (916) 327-5621. If you have any question regarding this survey or would like an electronic version, please contact Stella Ling-Taylor at (916) 322-5911 (slingtay@arb.ca.gov) or Ben Singh at (916) 327-1507 (rsingh@arb.ca.gov). Thank you for your cooperation.

1. Please provide the following information concerning your company/affiliation:

Company Name _____
Mailing Address _____

Contact Person(s) _____

Phone Number _____
FAX Number _____
E-Mail Address _____

2. Please check the box(s) which best describes the general nature of your business or your interest in the ACP program:

- a. ☐ Consumer Product Manufacturer or Marketer
b. ☐ Consumer Product Distributor
c. ☐ Contract Filler
d. ☐ Engineering & Consulting Services
e. ☐ Trade Association
f. ☐ Environmental Interest Group
g. ☐ Interested Individual
h. ☐ Government (describe) _____
i. ☐ Other (describe) _____

3. Are you aware of the California Consumer Products Regulations, including the ACP regulation?

- ☐ all of it
☐ none of it
☐ VOC limits, but not ACP

4. Are you interested in participating in future workshops or teleconferences and being involved in amending the ACP regulation?

- a. ☐ yes
b. ☐ no
c. ☐ don't know
d. ☐ keep on mailing list, not participating

We are in the process of forming a task force to amend the ACP regulation. The anticipated time frame for the amendment process is nine (9) months. Future workshops and meetings will be held in Sacramento, CA. Telecommunication is available for interested parties.

5. Would you like to receive additional information on the ACP regulation and/or participate in forming a task force, and/or attend future public meetings involving the amendment to the ACP regulation?

- a. ☐ all of the following
b. ☐ receive additional information
c. ☐ join task force
d. ☐ attend public meetings/workshops
e. ☐ not interested at this time

The following questions are for interested parties: We also recommend that you review the ACP regulation which is available on the ARB website (address listed on first page).

6. Would the ACP regulation benefit your business?

☐ yes ☐ no ☐ don't know

7. What benefits does your business anticipate?

- a. ☐ Flexibility in meeting the Consumer Products Reg
- b. ☐ Financial gain in trading emission reduction credits
- c. ☐ Preserve existing VOC formulations
- d. ☐ Provide additional time to reformulate products
- e. ☐ Other _____

8. What concerns or perceptions does your business have with the current ACP regulation?

- a. ☐ All of the following
- b. ☐ Time needed to apply for the ACP
- c. ☐ No standard application form/guidelines
- d. ☐ Complex application process
- e. ☐ Complexity of the regulation
- f. ☐ "User Friendliness" of the ACP regulation
- g. ☐ Confidentiality of submitted information
- h. ☐ EPA Acceptance
- i. ☐ Documentation of enforceable California sale records
- j. ☐ Limited or no benefit to my business (e.g. insufficient product diversity for averaging)
- k. ☐ Unfair advantage for large companies or manufacturers that produce large variety of consumer products
- l. ☐ Credit Life
- m. ☐ Limited credit use
- n. ☐ Limited market for the surplus emissions credits
- o. ☐ Other _____

9. Do you think that "easy to read" guidance and "Frequently Asked Questions (FAQ)" documents are needed for both the application and the annual reporting process?

- a. ☐ both
- b. ☐ none
- c. ☐ guidance & FAQ document for application only
- d. ☐ guidance & FAQ document for annual reporting only

10. Would you like on-line assistance (electronic ACP spreadsheet) and/or training seminar in completing the ACP and the surplus emission reduction credit application?

- a. ☐ both
- b. ☐ none
- c. ☐ on-line assistance
- d. ☐ training seminar

11. Should the surplus emission reduction credits be extended beyond the current credit life of one (1) year?

☐ yes ☐ no

12. Would you like credits tradable between companies or manufacturers regardless of size? Currently, surplus emission reduction credits are tradable only to small or one-product businesses operating under an approved ACP.

☐ yes ☐ no

13. What incentives would help encourage your company to donate surplus emission reduction credits to the state of California?

- a. ☐ plaque and/or certificate
- b. ☐ corporate recognition through press release
- c. ☐ tax credit
- d. ☐ other _____

14. Would you be willing to discount existing emission reduction credits in exchange for greater flexibility (e.g. less burdensome reporting & application process) to the ACP regulation?

☐ yes ☐ no ☐ don't know

15. Would you be willing to generate emission reduction credits by adding unregulated products to the ACP regulation?

☐ yes ☐ no ☐ don't know

16. Credits are currently based on pounds of VOC reduced. Should credits be also based on pounds of ozone reduced (i.e. reactivity of a product)?

☐ yes ☐ no ☐ don't know

17. Would you like to trade surplus emission reduction credits between antiperspirants and deodorants (AP/DO) and consumer products?

☐ yes ☐ no ☐ don't know

Additional Comments: (Attach additional page if needed)

18. Do you have any suggestions that would simplify the maintenance & tracking of an emissions reduction credit program?

19. Please write additional comments below.
